

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION OPIATE
LITIGATION

This document relates to:

*The Muscogee (Creek) Nation v. Purdue Pharma
L.P., et al.*
Case No. 18-op-45459

*The Blackfeet Tribe of the Blackfeet Indian
Reservation v. AmerisourceBergen Drug
Corp., et al.*
Case No. 18-op-45749

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DECLARATION OF SEAN MORRIS IN SUPPORT OF THE MANUFACTURER
DEFENDANTS' JOINT MOTION TO DISMISS THE TRIBES' FIRST AMENDED
COMPLAINTS**

I, SEAN MORRIS, declare as follows:

1. I am a partner at the law firm of Arnold & Porter Kaye Scholer LLP and counsel of record for Defendants Endo Pharmaceuticals Inc., Endo Health Solutions Inc., Par Pharmaceutical, Inc., and Par Pharmaceutical Companies, Inc. in the above-captioned matters. I am a member in good standing of the State Bar of California. I submit this declaration in support of the Manufacturer Defendants' Joint Motion to Dismiss the Tribes' First Amended Complaint. I have personal knowledge of the following facts and, if called and sworn as a witness, could and would testify competently thereto.

2. Attached hereto as Exhibit A is a true and correct a true and correct copy of a Letter from the Food and Drug Administration ("FDA") to Physicians for Responsible Opioid

Prescribing ("PROP"), dated September 10, 2013, available at <https://www.regulations.gov/document?D=FDA-2012-P-0818-0793> (last accessed August 31, 2018).

3. Attached hereto as **Exhibit B** is a true and correct copy of *Acoma Pueblo v. American Tobacco Co.*, No. 99-CV-1049 (D.N.M. July 30, 2001).

I declare under penalty of perjury that the foregoing is true and correct. This declaration was executed in Los Angeles, California on August 31, 2018.

/s/ Sean Morris

Sean Morris

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*Attorneys for Defendants Endo
Pharmaceuticals Inc., Endo Health
Solutions Inc., Par Pharmaceutical, Inc.,
and Par Pharmaceutical Companies, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2018, a copy of the foregoing Declaration of Sean Morris in Support of the Manufacturer Defendants' Joint Motion to Dismiss the Tribes' First Amended Complaint was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Dated: August 31, 2018

/s/ Jonathan L. Stern

Jonathan L. Stern

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